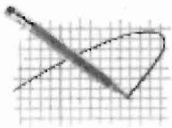


Umesh Dholakia/R2/USEPA/US
04/10/2008 10:02 AM

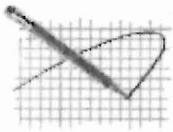
To leimarysdelgado@jca.gobierno.pr
cc BrendaPomales@jca.gobierno.pr
bcc
Subject Fw: Essroc San Juan, Inc.

Based on the discussions I had with Steve Riva and Frank Jon (who issued 2002 non-app)- please have Essroc submit an applicability determination request to Steven C. Riva, Chief, Permitting Section, EPA Region 2, 290 Broadway, NY, NY 10007.

If you have any other questions, please let me know.

Umesh

----- Forwarded by Umesh Dholakia/R2/USEPA/US on 04/10/2008 09:58 AM -----



Umesh Dholakia/R2/USEPA/US
04/09/2008 03:33 PM

To leimarysdelgado@jca.gobierno.pr
cc BrendaPomales@jca.gobierno.pr
Subject Re: Essroc San Juan, Inc.

Hi! Leimarys:

Please help me understand what Essroc plans to do. Here are my questions:

1. Where will the slag, lime stone and pozzolans material be added into the process? Will they be added in the kiln to make clinker?
2. Will these materials be added to the clinker after clinker comes out of the kiln? It all depends on the type of cement being produced- in some facilities slag is added as feedstock whereas in some it's added at the end.
3. What are the relationships-359,500 tons clinker substituted, use 799,000 tons of clinker, 850,000 tons cement produced and clinker ground not to exceed 726,117 tons/365 days?
4. How all these will impact the particulate, CO and NOx emissions?

I will be able to respond to your questions once I understand what Essroc plans to do and how the emissions will be impacted.

Umesh

leimarysdelgado@jca.gobierno.pr

leimarysdelgado@jca.gobierno.pr
04/07/2008 08:59 AM

To Umesh Dholakia/R2/USEPA/US@EPA
cc BrendaPomales@jca.gobierno.pr
Subject Essroc San Juan, Inc.

Hi Umesh:

Essroc San Juan, Inc.
PFE-26-0189-0051-I-II-C
Dorado, PR

Essroc submitted an application for construction permit modification to substitute part of the clinker used. Essroc is planning to substitute

25% of clinker for slag (199,750 ton/year),
5% of clinker for limestone (39,950 ton/year), and
15% of clinker for pozzolans material (119,850 ton/year).

Essroc states that the potential substitution will be 359,500 ton/year of clinker to be produced or buyed.

According to Essroc's calculations, Essroc will use 799,000 ton/year of clinker. (Maximum clinker usage for cement production: 799,000 ton/yr (based on Essroc quality criteria and not a permit limit) based on 94% of clinker on cement production (850,000 ton/yr Cement Production)).

The PSD Non-Applicability Restrictions for Essroc was revised on August 13, 2002 and limits the production of cement to 850,000 tons/365 days.

Conditions 2 and 3 established:

Only Kiln No. 3 shall be used at the facility to produce clinker that will be ground and it shall not exceed 726,117 tons of cement/365 days.

The additional clinker needed to achieve the 850,000 tons/365 days of cement production shall be supplied from sources outside the plant. No increase in clinker production from Kiln No. 3 shall be allowed in order to meet this increased production.

Essroc also proposed a project to inyecto dust from the dust collectors, with the purpose of recycling the dust, sending it to the raw material silo or mill 2 silo to dosify the final product (Masonry Cement). The transfer will be closed circuit.

We need to know if Essroc shall submit anything to EPA to modify the Non-Applicability Restrictions for the substitution of clinker?

Thanks,

Leimarys